

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 2116, 2117 & 2250

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER
(I) AUTHORIZING THE DEBTORS TO (A) REJECT CERTAIN UNEXPIRED LEASES
EFFECTIVE AS OF MARCH 17, 2025 AND (B) ABANDON CERTAIN PERSONAL
PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* (D.I. 461) (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on February 26, 2025, the Debtors filed the *Thirty Third Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 2216) (the “**Thirty Third Rejection Notice**”), the *Thirty Fourth Notice of Rejection of Certain Executory Contracts and/or Unexpired*

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Leases (and the Abandonment of Property) (D.I. 2217) (the “**Thirty Fourth Rejection Notice**”) and the *Thirty Fifth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 2250) (the “**Thirty Fifth Rejection Notice**” and, together with the Thirty Third, and Thirty Fourth Rejection Notices, the “**Rejection Notices**”).

3. The deadline to object to the Thirty Third and Thirty Fourth Rejection Notices was March 26, 2025, and the deadline to object to the Thirty Fifth Rejection Notice was March 31, 2025, at 4:00 p.m. (ET). Prior to the objection deadlines, counsel to PepsiCo asked for clarifying language that nothing contained in Order would impact any ownership interest of PepsiCo. The Debtors have added such language in a revised order (the “**Revised Order**”). The Debtors are unaware of any other objections or comments to the Rejection Notices.

4. Attached hereto as **Exhibit A** is the Revised Order approving the Rejection Notices and authorizing the Debtors to reject the leases set forth in the Rejection Notices as of March 17, 2025. For the convenience of the Court and all parties in interest, a redline of the Revised Order against the form of order filed with the Rejection Notices is attached hereto as **Exhibit B**. The Debtors now seek entry of the Revised Order with respect to the leases set forth in the Rejection Notices.

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WHEREFORE, the Debtors respectfully request that the Court enter the Revised Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: April 2, 2025
Wilmington, Delaware

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